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BLUE SHIELD OF CALIFORNIA LIFE AND HEALTH
INSURANCE COMPANY

Additional counsel listed on next page.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SALOOJAS INC.,

Plaintiff,

vs.

BLUE SHIELD OF CALIFORNIA LIFE
AND HEALTH INSURANCE COMPANY,

Defendant.

Case No. 3:22-cv-03267-MMC

Hon. Maxine M. Chesney

**STIPULATION TO EXTEND
DEFENDANT BLUE SHIELD OF
CALIFORNIA LIFE & HEALTH
INSURANCE COMPANY'S DEADLINE
TO RESPOND TO THE AMENDED
COMPLAINT BY 14 DAYS AND
[PROPOSED] ORDER**

[L.R. 6-2]

1 Plaintiff Saloojas Inc. (“Plaintiff”) and Defendant Blue Shield of California Life and
2 Health Insurance Company (“Blue Shield”), through their counsel of record and in accordance
3 with Local Rules 6-2 and 7-12, stipulate as follows:

4 1. Plaintiff filed the amended complaint in this action on October 24, 2022 (ECF No.
5 28) and filed two additional documents titled “Amended Complaint—*corrected version*” on
6 October 26, 2022 (ECF Nos. 29, 30).

7 2. Under Rule 15 of the Federal Rules of Civil Procedure, the original deadline for
8 Blue Shield to respond to the amended complaint (ECF No. 28) is November 7, 2022.

9 3. Blue Shield seeks and Plaintiff has agreed to an extension of 14 days for Blue
10 Shield to answer, move against, or otherwise respond to the amended complaint. Blue Shield’s
11 new deadline, if approved by the Court, will be November 21, 2022.

12 4. Good cause exists for the extension because Blue Shield’s counsel has several
13 conflicts during the next two weeks, including complex motion practice and out-of-town
14 depositions in other complex matters. Blue Shield thus needs additional time to respond to the
15 amended complaint.

16 5. The extension does not alter the date of any event or any deadline already fixed by
17 Court order.

18 6. The stipulation is filed in accordance with the requirements of Local Rule 6-2.

19 SO STIPULATED.
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1 Dated: October 31, 2022

MANATT, PHELPS & PHILLIPS, LLP

2
3 By: /s/ Joseph E. Laska
4 Joseph E. Laska
5 Attorneys for Defendant
6 BLUE SHIELD OF CALIFORNIA LIFE & HEALTH
7 INSURANCE COMPANY

8 * Under Civil Local Rule 5-1(h)(3), I attest that concurrence
9 in the filing of this document has been obtained from each of
10 the other signatories.

11 Dated: October 31, 2022

LAW OFFICE OF MICHAEL LYNN GABRIEL

12 By: /s/ Michael Lynn Gabriel
13 Michael Lynn Gabriel
14 Attorneys for Plaintiff
15 SALOOJAS INC.

16 **PROPOSED ORDER**

17 For good cause shown, the Court approves the stipulation. Defendant Blue Shield of
18 California Life & Health Insurance Company's deadline to respond to the amended complaint is
19 extended by 14 days to November 21, 2022.

20 SO ORDERED.

21 Dated: _____, 2022

22 By: _____
23 Hon. Maxine M. Chesney
24 United States District Judge